

Moelto, J.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MISS UNIVERSE L.P., LLLP, and  
DONALD J. TRUMP, both individually and  
derivatively on behalf of  
MISS UNIVERSE L.P., LLLP,

Plaintiffs,

-against-

UNIVISION NETWORKS & STUDIOS, INC.  
and ALBERTO CIURANA, individually,

Defendants.

Case No. 15 CV 5377 (JGK) (JLC)

**STIPULATION AND ORDER FOR THE EXTENSION OF  
TIME WITHIN WHICH TO MOVE TO DISMISS THE COMPLAINT**

**WHEREAS**, Plaintiffs Miss Universe L.P., LLLP and Donald J. Trump ("Plaintiffs")  
filed a summons and complaint (collectively, the "Complaint") in the above-captioned matter on  
June 30, 2015 in the Supreme Court of the State of New York, naming as defendants Univision  
Networks & Studios, Inc. and Alberto Ciurana ("Defendants");

**WHEREAS**, Plaintiffs served the Complaint on Defendant Univision Networks &  
Studios, Inc. on July 2, 2015;

**WHEREAS**, undersigned counsel for Defendants agreed to accept service on behalf of  
Defendant Alberto Ciurana, which service was completed on July 15, 2015;

**WHEREAS**, Defendants filed a Notice of Removal in this Court on July 10, 2015, and  
served the Notice of Removal on Plaintiffs on July 10, 2015;

**WHEREAS**, Defendants' response to the Complaint is currently due on August 26, 2015  
by joint stipulation of the parties;

**WHEREAS**, Defendants intend to move to dismiss the Complaint and are ready and able to do so on or before August 26, 2015;

**WHEREAS**, this Court's Individual Rules of Practice require a pre-motion conference with the Court before the filing of a motion to dismiss is permitted;

**WHEREAS**, Defendants have been informed by the Court Clerk that given the Court's current schedule, a pre-motion conference before August 26, 2015 is impracticable;

**WHEREAS**, in light of the inability to schedule a pre-motion conference with the Court before August 26, 2015, the parties have agreed to further extend the time by which Defendants may move to dismiss the Complaint;

**WHEREAS**, this is the second time the parties have agreed and jointly stipulated to extend the time to move, answer, or otherwise respond to the Complaint;

**WHEREAS**, the parties agree that Plaintiffs shall be permitted 45 days within which to respond to Defendants' motion to dismiss; and

**WHEREAS**, this Stipulation is entered without prejudice to Defendants' right to file a reply brief responding to Plaintiffs' responsive brief;

**NOW THEREFORE**, it is hereby stipulated and agreed, subject to the approval of the Court, that:


1. The August 26, 2015 deadline for responding to the Complaint is adjourned;
2. Defendants shall file their motion to dismiss on a date to be set by the Court at the pre-motion conference contemplated herein;
3. Plaintiffs shall have 45 days from service of Defendants' motion to dismiss to respond to the motion to dismiss; and

4. Defendants shall have the right to file a reply brief in further support of their motion to dismiss.

Dated: August 19, 2015  
New York, New York

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*Attorneys for Defendants Univision Networks  
& Studios, Inc. and Alberto Ciurana*

Dated: August 20, 2015  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE, PART I